

GALLO VITUCCI KLAR LLP

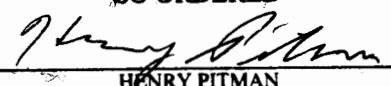
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December 14, 2015

Magistrate Judge Henry B. Pitman
United States District Court
Southern District of New York
500 Pearl Street – Room 18A
New York, New York 10007

APPLICATION GRANTED

Re: **Walpert v. Jaffrey et al**
Docket no.: 1:13-cv-05006-PGG-HBP
Request for Extension of Time

SO ORDERED

HENRY PITMAN
UNITED STATES MAGISTRATE JUDGE
12-15-15

Dear Hon. Magistrate Judge Pitman:

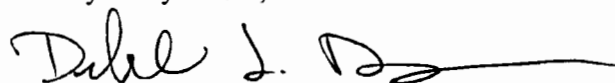
This office represents the defendants Syed Jaffrey, et al. in the above referenced matter. We are writing to request a 30-day extension of the December 23 deadline for the submission of defendants' responses to plaintiff's submission (Docket #81) to January 23. This is the first request for an extension. In accordance with Your Honor's rules, we contacted plaintiff's counsel Blair Fensterstock earlier today to request counsel's consent to this application. Mr. Fensterstock stated that he could not consent "because this is [a] court ordered" deadline

We are seeking this adjournment due to the holiday season and my personal and professional commitments. In addition, my client currently resides in Asia and the 10 hour time difference makes it difficult to communicate in realtime. My client is working closely with me but we are somewhat slowed by the time difference and the prior commitments.

Further, in accordance with your Honor's requirements (Docket #81), we "request an in-court hearing."

Thank you for your cooperation with this request.

Very Truly Yours,



Deborah J. Denenberg

DJD/mh

cc: Blair Fensterstock - bfensterstock@fensterstock.com